



PANAM AQUATICS INC.

INTEGRITY CODE

MAY 17, 2025



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INTRODUCTION

DEFINITIONS

1.1 Words and phrases capitalised in this Integrity Code are defined terms. Unless otherwise specified, they have the meaning set out in the Definition section to this Integrity Code. Any other capitalised terms in this Code, if not defined in this Code, shall have the meaning for them set out in the PAQ Constitution.

1.2 These terms have the following definitions:

Aquatics: All sport disciplines governed by PAQ, including Swimming, Open Water Swimming, Diving, High Diving, Water Polo, Artistic Swimming, Masters, and any other discipline that may be governed by PAQ from time to time.

AQIU: The independent World Aquatics Integrity Unit established under the World Aquatics Constitution and comprised of the Supervisory Council, Chief Integrity and Compliance Officer, Adjudicatory Body, Investigatory Body and Anti-Doping Advisory Body.

Athlete: A person (i) who is taking part in aquatics competitions and events at national or international level, organised in accordance with the PAQ Constitution, PAQ Rules and Regulations and/or regulations of PAQ Members or affiliated entities and/or (ii) who is registered by his/her respective national federation.

Athlete Support Personnel: Any coach, trainer, manager, agent, team staff, official, medical, paramedical personnel, parent or any other person working with, treating or assisting an Athlete participating in or preparing for an Event.

Benefit: The direct or indirect receipt or provision of money or the equivalent by a Covered Person for themselves or a Related Party such as, but not limited to bribes, gains, Gifts and other advantages including, without limitation, winnings and/or potential winnings as a result of a wager; the foregoing shall not include official prize money, appearance fees or payments to be made under sponsorship or other similar contracts.

Bet or Betting: Placing, accepting, laying or otherwise entering into any wager of a stake of monetary value in the expectation of a prize of monetary value, subject to a future and uncertain occurrence.

Betting Organisation: Any person or company or other undertaking (a) that promotes, brokers, arranges or conducts any form of Betting activity or that has interests in Betting in any form whatsoever; or (b) that can reasonably be perceived as being connected in any way with Betting of any kind.

CAS: The Court of Arbitration for Sport in Lausanne, Switzerland.

Claimant: The Covered Person(s) (or legal guardian in the event the Claimant(s) is a minor or incapacitated) who is alleged to have experienced conduct that constitutes a violation of this Integrity Code.

Commencement Date: The date on which this Code comes into force, being May 17, 2025.

Covered Person: Covered Persons are:

- a) persons who are, or are seeking to become (whether by election or appointment or otherwise) PAQ Officials or Other Officials;
- b) any Athlete;

- c) any Athlete Support Person;
- d) any team or other entity participating in any Event;
- e) PAQ Members;
- f) Members and clubs of PAQ Members; and
- g) Any other person or party specified by PAQ.

Decision: A decision rendered by the PAQ Integrity Unit.

Demand: A written demand to a Covered Person to provide any information, record, article or thing in their possession or control that the PAQ Integrity Officer reasonably believes may evidence or lead to the discovery of evidence of an Integrity Code Violation.

Event: Any PanAm Aquatics Championships, PanAm Aquatics Cups, PanAm Aquatics Water Polo Cups for Club teams, events and tournaments sanctioned by PAQ members and international events within the Americas in any of the Aquatics disciplines (not those organised by World Aquatics).

Forbidden Conduct: any conduct described in Article 13 of this Integrity Code.

Gift: An item for use or advantage by a Covered Person or a Related Party.

Governing Body: The PAQ Governing Body/Board of Directors/Executive Body, as defined in the PAQ Constitution.

Hospitality: Means providing or arranging for the provision of food and drink and/or attendance at events, shows, dinners, conferences or other events, including providing or arranging related accommodation and/or transportation for a Covered Person or a Related Party, except when provided pursuant to a contractual obligation.

Inside Information: Information that a Covered Person possesses by virtue of their position in relation to PAQ or any Event, excluding any information already published or in common knowledge, easily accessible to interested members of the public or disclosed in accordance with the rules and regulations governing the relevant Event.

Integrity Code Violation: Where a Covered Person:

- Fails to comply with any of the requirements set out in this Integrity Code, or any integrity requirements of the PAQ Constitution or PAQ Rules and Regulations;
- attempts or agrees with any other person to engage in conduct (whether by act or omission) that would culminate in a breach of any requirement of this Integrity Code (unless the Covered Person renounces their attempt or agreement prior to it being discovered by a third party not involved in the attempt or agreement);
- solicits, induces, instructs, persuades or encourages any person to engage in conduct (whether by act or omission) that would amount to a breach of any requirement of this Integrity Code if committed by the Covered Person themselves; and/or
- authorises, causes, or knowingly assists, encourages, aids and abets, covers up or attempts to cover up, or is otherwise complicit in, any act or omission by any person that would amount to a breach of any requirement of this Integrity Code if personally committed by the Covered Person.

Minor: Any person under the age of 18 years or, where applicable, a person who is under the age of majority and meets the definition of a child for the purposes of protection in the country where the

predominant nature of the alleged misconduct occurred.

Other Officials: Other Officials are:

- members of PAQ executive bodies, committees, units, panels and advisory boards of PAQ Members, PAQ Member teams or delegation members (or other persons accredited to attend any Event on behalf of any PAQ Member);
- persons who act, or are entitled to act, for or on behalf of PAQ, and/or PAQ Members, including (without limitation), staff, consultants, agents and advisors;
- each person appointed/selected to work/volunteer at an Event and/or attending an Event on behalf of PAQ or a PAQ Member, including (without limitation), any technical official, technical committee member, specialised committee member, delegate, and any other person who receives accreditation to an Event as a representative of PAQ, World Aquatics or a PAQ Member;
- persons or entities organising and/or promoting an Event, including any candidate/host city seeking to host or hosting an Event, local organising committee(s), and any of its officials, employees, volunteers and/or other persons entitled to act or attend an Event on its behalf; and
- any other persons who agree in writing to be bound by this Integrity Code.

PAQ: PanAm Aquatics Inc. - The sole and exclusive governing body for the sport of Aquatics in the Americas.

PAQ Executive Committee: The Executive Committee of PAQ as defined in the PAQ Constitution.

PAQ Member: A national body recognised by PAQ to be a member of PAQ.

PAQ Integrity Officer: The PAQ Integrity Officer shall be an independent person appointed by the PAQ Executive Committee who shall be responsible for receiving, monitoring, and investigating Reports of Integrity Code violations and enforcement of the Integrity Code. The PAQ Integrity Officer, in consultation with the PAQ Executive Committee, may refer and delegate the powers of the PAQ Integrity Officer to the AQUA Integrity Unit, or such other body deemed appropriate.

PAQ Integrity Unit: The independent PAQ Integrity Unit established by PAQ and comprised of the PAQ Integrity Officer and a panel of persons established by the PAQ Integrity Officer in consultation with the PAQ Executive Committee.

PAQ Official: Any person elected or appointed to any position within PAQ or a PAQ Member, including but not limited to:

- The President, Vice-Presidents, Governing Body members, Honorary Life Presidents, Immediate Past President, Treasurer, and any candidates for election to the Governing Body; and
- Each person serving as a member of (or candidate for) a committee, working group, unit (including, without limitation, the PAQ Integrity Unit), or advisory board of PAQ, and each person appointed to represent PAQ on any committee or working group or in any similar role.

PAQ Rules and Regulations: Any rules, by-laws and policies of PAQ, as amended from time to time and the PAQ Constitution.

Party(ies): PAQ and the PAQ Integrity Unit on one side and the

Covered Person on the other side.

Related Party: Immediate family member, being a partner/spouse, parent, sibling, child or dependant and, in all cases, whether natural, adoptive or step.

Reports: All reports of any potential Integrity Code Violation, including any approaches or requests to engage in conduct that may constitute an Integrity Code Violation.

Respondent: The Respondent shall be the Covered Person subject to the filing.

Staff Member: Each person employed (whether full-time, part-time, permanently, for a fixed-term or temporarily) or engaged as an agent, consultant or contractor for, or otherwise functioning as a member of the staff of, PAQ or a PAQ Member.

Substantial Assistance: means (a) the Covered Person's provision to PAQ (or the PAQ Integrity Unit) of truthful, accurate and complete information about potential Integrity Code Violations and/or other similar laws or regulations of which the Covered Person has knowledge; and (b) full cooperation with the investigation and prosecution (whether by the PAQ Integrity Unit/PAQ or by another body, including a criminal or regulatory body) of such violations, including (without limitation) by testifying at a hearing if required to do so.

World Aquatics: The sole and exclusive world governing body for all Aquatics, formerly known as the Fédération Internationale de Natation (FINA),

2. PURPOSE AND SCOPE

- 2.1 PAQ has adopted this Integrity Code to establish clear integrity standards for persons involved in the activities of PAQ, to protect the health, safety and well-being of Athletes, to prohibit conduct that might undermine public confidence in the integrity of Aquatics and/or in the uncertainty of outcome of Events, and to establish effective mechanisms for enforcement of this Integrity Code and sanctions for any violation.
- 2.2 PAQ is committed to uphold integrity in the governance and administration of Aquatics as a basic principle of good governance and as a fundamental precept of its autonomous role as the governing body of Aquatics for the Americas, in the best interests of the sport and its stakeholders.
- 2.3 PAQ is also committed to uphold the integrity of Aquatics on the field of play. The essence of the Aquatics' disciplines is the contest between competing athletes and teams as an honest test of skill and ability, the outcome of which is determined by (and only by) the contestants' relative sporting merits. Any manipulation of sports competitions or other conduct that might undermine public confidence in the integrity of the sporting contest and/or in the uncertainty of its outcome is fundamentally at odds with that essence of the Aquatics' disciplines and must be eradicated at all costs.
- 2.4 Conduct prohibited under this Integrity Code may also amount to a criminal offence and/or a violation of other applicable laws or regulations, including employment laws, in national jurisdictions. This Integrity Code is not intended to replace these laws and regulations, but to supplement them with further rules

of professional conduct for those involved in the governance and administration of Aquatics, and/or in the staging and conduct of Aquatics events. It operates without prejudice to these laws and regulations, and vice versa.

- 2.5 Conduct prohibited under this Integrity Code may also amount to violation of other PAQ Rules. This Integrity Code is not intended to replace these Rules, but to supplement them with further rules of professional conduct. It operates without prejudice to these Rules, and vice versa. In particular, any rule of a disciplinary nature applicable to a certain discipline and/or a certain event, remain reserved and are not set aside by the present Integrity Code.
- 2.6 For the avoidance of doubt, this Integrity Code shall not replace or in any way affect or alter PAQ's ability to pursue appropriate disciplinary action against a Staff Member under the terms of any employment or consultancy contract with the Staff Member, including under any of PAQ's employment policies in force from time to time. Where conduct prohibited under this Integrity Code also amounts to a violation of the terms of a Staff Member's employment or consultancy arrangement with PAQ, PAQ shall be entitled, at its absolute discretion, to elect to pursue contract and/or disciplinary action against the Staff Member pursuant to the applicable employment or consultancy contract. PAQ shall not be required to have first instituted, or to subsequently institute, any action under this Integrity Code.
- 2.7 For avoidance of doubt, this Integrity Code is not intended to replace the Integrity Code or similar rules and regulations of PAQ Members. Conduct occurring in the geographic limits of a PAQ

Member and solely involving individuals or entities from that PAQ Member shall be addressed under the PAQ Member's Integrity Code or similar rules and regulations.

- 2.8 For the avoidance of doubt, matters of doping are not part of this Integrity Code and shall be enforced by World Aquatics or PAQ in accordance with the provisions set out in the World Aquatics Doping Control Rules and any applicable Doping Control Rules established by a PAQ Member.
- 2.9 In the case of conflict between the provisions of World Aquatics Doping Control Rules on one side and the provisions of this Integrity Code on the other side, the provisions of the World Aquatics Doping Control Rules shall prevail.
- 2.10 This Integrity Code will come into full force and effect on the Commencement Date.

GENERAL DUTIES

3. DUTIES OF GOOD CONDUCT

- 3.1 Covered Persons must always act honestly, fairly, impartially and in accordance with the highest ethical standards of integrity and transparency.
- 3.2 Covered Persons must avoid any conduct that is inconsistent with, or that undermines in any way the objectives of this Integrity Code.
- 3.3 Covered Persons must avoid acts or omissions that give the appearance of impropriety, or that disparage PAQ, World Aquatics, or that bring (or have the potential to bring) PAQ, World Aquatics, Aquatics and/or sport generally into disrepute.

- 3.4 Covered Persons must not be involved with entities or persons whose activities or reputations are inconsistent with the principles set out in this Integrity Code. For this provision to apply, it is necessary that the Covered Person has previously been advised in writing by PAQ, a PAQ Member, or other relevant authority with jurisdiction over the Covered Person, that there should be no more association with such entity/person, and of the consequences that will apply if any association continues.
- 3.5 Covered Persons must avoid any offensive, violent or disrespectful behaviour towards other participants, including, the officials, other athletes, media, and/or spectators during the entire conduct and reasonable aftermath of an Event. Such behaviour towards a doping control official is also prohibited at any time.
- 3.6 Covered Persons must avoid any act of discrimination that constitutes behaviour, policies, and/or practices which contribute to differential, inequitable, adverse or otherwise inappropriate treatment of or impact on an individual or class of individuals based on one or more prohibited grounds, which include race, national, social or ethnic origin, colour, indigeneity, religion, age, sex, sexual orientation, gender identity or expression, pregnancy, marital status, family status, language, genetic characteristics or disability, and analogous grounds. Behaviour, policies, and/or practices specifically benefitting members of marginalized groups shall not be considered discrimination. Discrimination does not include behaviour, policies and/or practices rationally connected to legitimate sport objectives with the honest and good faith belief that they are reasonably necessary to accomplish the relevant objectives, provided that accommodation of the needs of an individual or a class of individuals affected would

impose undue hardship on the Covered Persons that would have to accommodate those needs, considering health, safety, cost, and legitimate sport objectives.

- 3.7 Covered Persons must avoid unreasonable interference, disobedience or obstruction in or to the orderly conduct of any sporting Event within or outside of the venue(s).
- 3.8 Covered Persons must avoid interference with any aspect of the field of play.
- 3.9 Covered Persons must actively participate in the full conduct of the Event, including victory ceremonies and, if applicable, presentations and/or press conferences.

4. DUTY TO REPORT AND COLLABORATE

- 4.1 Each Covered Person, eighteen (18) years of age and over, must:
 - a) report to the PAQ Integrity Officer, without delay, all knowledge concerning any approach or invitation received by that person to engage in a conduct that would amount to an Integrity Code Violation;
 - b) report to the PAQ Integrity Officer, without delay, all knowledge concerning any incident, fact or matter that comes to the attention of that person that might evidence an Integrity Code Violation by another person; and
 - c) cooperate fully with all investigations carried out by, or under the authority of, the PAQ Integrity Officer in relation to possible Integrity Code Violations (including, without limitation, by providing any information and/or documentation requested as part of that investigation,

including by way of a Demand).

- 4.2 Covered Persons have a continuing obligation to report any new incident, fact, or matter to the PAQ Integrity Officer, even if the Covered Person has already reported their prior knowledge in relation to the matter.
- 4.3 For the avoidance of doubt, obstructing or delaying any investigation carried out by (or on behalf of) PAQ in relation to a possible Integrity Code Violation, including without limitation concealing, tampering with or destroying any documentation or other information that might be relevant to the investigation, will constitute an Integrity Code Violation.
- 4.4 A Covered Person is not obligated to, but may, report an incident to which that Covered Person was personally subject, nor is a Covered Person obligated to report an incident if the Covered Person received the information about the incident only through an explicitly confidential disclosure.

5. CONFIDENTIALITY

- 5.1 Covered Persons must not disclose to any third party any information disclosed to them in confidence as a result of their activities or dealings with PAQ, except where: (1) required by law; (2) PAQ agrees in writing in advance; or (3) that information is already in the public domain (other than by reason of their violation of this Article 5). Any duties of confidentiality on Covered Persons under this Integrity Code shall continue in perpetuity even after such Covered Persons ceases to be bound by this Integrity Code.

6. DUTY TO AVOID CONFLICTS OF INTEREST

6.1 Undivided Loyalty

PAQ Officials owe a duty of undivided loyalty to PAQ. They must make decisions (including as to how to vote on a specific motion) based solely on their independent and objective judgement, made in good faith, of what is in the best interests of PAQ and the sport of Aquatics as a whole. They must not allow themselves to be influenced by and they must not seek to advance any conflicting interests.

6.2 Disclosure Statement

Each PAQ Official (except legal persons) shall file a disclosure statement with the PAQ Integrity Officer in the form prescribed by PAQ, listing any actual, apparent or potential conflicts known to the PAQ Official at that time. Each PAQ Official will be under a continuing duty to update that statement in writing, as and when changes or additions are required, to ensure the disclosure remains accurate and complete. The PAQ Integrity Officer will maintain a register of such disclosures.

6.3 Disclosure for conflicts arising during meeting

If a conflict arises during a meeting, the PAQ Official concerned must disclose the conflict to the PAQ Integrity Officer and the chair of the relevant meeting (even if it has already been declared in a disclosure statement). The PAQ Integrity Officer or the chair of the relevant meeting will advise the meeting of the conflict and cause the conflict to be recorded in the register maintained by the PAQ Integrity Officer (and, where applicable, in the minutes of the relevant meeting) if it has not been

recorded there already.

6.4 Personal/financial/commercial conflicts

Where there is an actual, apparent, or potential conflict between the interests of PAQ and personal, financial or commercial interests of a PAQ Official or of the relatives, friends or acquaintances of a PAQ Official, the PAQ Official must disclose all relevant information about that conflict promptly, accurately, and fully to the PAQ Integrity Officer.

6.5 Methods for handling conflicts

In every case, unless otherwise specified by the PAQ Integrity Officer or the chair of the meeting, the PAQ Official who is the subject of the conflict must:

- a. excuse themselves from any discussions relating to the conflict;
- b. abstain from voting and/or from seeking to influence the vote on any matter impacted by the conflict; and
- c. refrain from taking any other part in the handling of the conflict or of the matter impacted by the conflict.

6.6 Institutional conflicts

PAQ Officials must also disclose in the same manner any 'institutional' conflicts of interest, i.e., actual, apparent or potential conflicts between the interests of PAQ and the interests of World Aquatics, a PAQ Member or other body with which the PAQ Official is associated (whether by virtue of employment or otherwise).

6.7 Allowance for interests of stakeholders

PAQ Officials may present the perspective of a particular stakeholder such as a PAQ Member, or of any third party, where they consider it relevant to the matter at hand, but they must not pursue the interests of that stakeholder or third party in a manner that would conflict with their overriding duty to act in the best interests of PAQ and the sport of Aquatics as a whole.

6.8 Recusal for institutional conflicts

On a case by case basis, PAQ Officials should decide if they should recuse themselves from decision making if their respective duties with their National Federation or AQUA conflict.

6.9 Covered Persons

Covered Persons must not abuse their position within PAQ in any way, especially for their own aims or objectives.

6.10 Office holders and staff of PAQ Members

Office holders and staff of a PAQ Member, in their dealings with PAQ, including when representing a PAQ Member at Congress and/or otherwise deciding how to exercise the rights of a PAQ Member, must act with undivided loyalty to the PAQ Member. They must not allow themselves to be influenced by and they must not seek to advance any conflicting interests, including the interests of any contractual partner of PAQ and/or a PAQ Member.

7. FALSIFICATION AND MISUSE OF FUNDS

7.1 Covered Persons must not forge a document or falsify an authentic document, or knowingly use a forged or falsified

document.

- 7.2 Covered Persons must not knowingly give false information, including false results, nationality and/or date of birth.
- 7.3 Covered Persons shall not take or omit to take any action in furtherance of an offer, payment, promise to pay, or authorisation of the payment of money or giving of anything of value, either directly or indirectly, to any third party, while knowing that all or some portion of the item of value will be offered, given or promised to anyone to improperly influence any action or decision, to obtain or retain business or otherwise to secure any improper advantage.
- 7.4 Covered Persons shall not misappropriate or misuse funds, whether directly or indirectly through, or in conjunction with, third parties. Covered Persons must use the resources of PAQ or PAQ Members only for lawful and ethical purposes authorised by the relevant body.
- 7.5 Covered Persons may only claim reimbursement for expenses properly and reasonably incurred in the course of their activities. Requesting, authorising, and/or accepting any undue pecuniary or other advantage is strictly prohibited.

8. OFFERING AND ACCEPTING GIFTS AND HOSPITALITY

- 8.1 Covered Persons may never offer or accept:
- a) any Gift, Hospitality or other benefit in their capacity as Covered Person that is given privately, not openly;
 - b) any Gift, Hospitality or other benefit that creates an actual, apparent or potential conflict of interest for the recipient or

that is intended or may reasonably be construed as being intended to influence the recipient improperly in their official activities (such as Gifts offered to technical officials, and Gifts offered by candidates to voting delegates); or

- c) any other Gift, Hospitality or other benefit (whether of a monetary value or otherwise) in circumstances that give rise to an appearance of impropriety or lead to the recipient's impartiality or integrity being called into question or to PAQ and/or the sport of Aquatics being brought into disrepute.

8.2 Without prejudice to Article 8.1, in their capacity as Covered Persons, Covered Persons may offer and accept:

- a) Tokens of consideration or friendship of nominal value, in accordance with prevailing local customs; and
- b) reasonable, proportionate, and bona fide corporate Gifts and Hospitality (including event accreditations or tickets), solely as a mark of respect or friendship;

provided that any such token, Gift, or Hospitality that is worth more than 250 USD (or the equivalent in any other currency) must be disclosed to the PAQ Integrity Officer, and, if it is not approved by the PAQ Integrity Office, it must be withdrawn or returned (as applicable).

9. BIDDING FOR EVENTS

9.1 Candidate and host cities seeking to host an Event organised by PAQ and its local organising committee(s), and any of its officials, employees, volunteers and/or other persons entitled to act or attend an Event on its behalf must conduct their candidacies with honesty, dignity, moderation and respect for their opponents, and in accordance with applicable law and any applicable PAQ Rules

and Regulations and/or guidelines, including this Integrity Code. They must also:

- a) Respect the bidding process established by PAQ;
- b) Refrain from soliciting or accepting any undue support or promotion from PAQ sponsors and other PAQ marketing partners;
- c) Refrain from making any agreement, coalition or collusion with other candidates; and
- d) Refrain from covering any costs and expenses of representatives of PAQ Members, in particular travel and accommodation until such bid is accepted.

Note: For the avoidance of doubt, in addition to any other information PAQ may require in any particular bidding procedure, PAQ, at its discretion, may require all candidate entities submitting bids to provide details of any financing or other support agreed with any third party, whether or not such financial or other support has actually been paid or is forthcoming.

9.2 Covered Persons must:

- a) respect the integrity of the bid process, allowing equal conditions and opportunities for each candidate and potential candidate, and treating each candidate and potential candidate in a fair and equal manner;
- b) not directly or indirectly solicit or accept any form of advantage from the process;
- c) not use the resources of PAQ to back any candidate; and
- d) be neutral in respect of bids for the grant of hosting rights, commercial rights and/or other rights, including refraining

from making any public declaration appearing to give an opinion on one or more candidates.

10. ELECTIONS

10.1 Candidates for elected PAQ positions must conduct their candidacies (and must ensure that persons assisting them with their candidacies conduct themselves) with honesty, dignity and respect for their opponents, and in accordance with applicable law and any applicable PAQ Regulations and/or guidelines, including this Integrity Code.

Note: A candidate is identified as such when his/her nomination is submitted to PAQ. Additionally, an individual shall be regarded as a candidate, and subject to PAQ Rules and Regulations and this Integrity Code, if he/she states his/her intention in public to be a candidate or campaign in such a way that gives the appearance of being a candidate, even if he/she has not been nominated.

10.2 Candidates may outline and describe in a written document their plans and views. Copies of any document used to support a candidature shall be provided by the candidates to the PAQ Integrity Unit. Directives of the PAQ Integrity Officer in respect of the content of the document shall be immediately observed and implemented by the candidates.

10.3 Candidates may grant interviews to the media. All communications undertaken by a candidate shall strictly respect the other candidates and shall in no way be prejudicial to any other candidate.

10.4 Candidates, being Covered Persons to whom Section 8.1 applies, must refrain from:

a) entering into any form of undertaking with any individual or

Organisation that is likely to affect the candidate's freedom of decision or action if elected;

- b) engaging in any act, coalition, collaboration or collusion by or between candidates with the intent to defraud or unduly manipulate the result of the vote; and
- c) Requesting or using support, resources or services from PAQ in connection with their candidacies, even if they currently occupy elected or appointed positions within PAQ.

10.5 Covered Persons and in particular voting delegates must:

- a) respect the integrity of the candidacy process, allowing equal conditions and opportunities for each candidate and potential candidate, treating them in a fair and equal manner, and avoiding any risk of conflict of interest;
- b) not accept Gifts or Hospitality from any candidate, unless permitted under this Integrity Code;
- c) not directly or indirectly solicit or accept any form of undue advantage from the process; and
- d) not use the resources of PAQ to assist or back any candidate.

PREVENTING THE MANIPULATION OF AQUATICS COMPETITIONS

11. ANTI-CORRUPTION RULES

11.1 Each of the following, when committed by a Covered Person (whether directly or indirectly through any third party), will constitute an Integrity Code Violation by that Covered Person:

11.1.1 Betting in relation to:

- a) any Aquatics Event, whether or not the Covered Person is

directly participating in that Aquatics Event; and

- b) any non-Aquatics sport event, if it features in a multi-sport competition in which Aquatics Events are featured, if the Covered Person is directly participating in that multi-sport competition. For example, an Athlete participating in the Olympic Games is not allowed to bet on tennis at the Olympic Games.

11.1.2 Manipulation of Events – i.e. An intentional arrangement, act or omission aimed at an improper alteration of the result or the course of any Event in order to remove all or part of the unpredictable nature of such Event with a view to obtaining an undue Benefit for oneself or for others. This includes (without limitation) match-fixing and spot-fixing.

11.1.3 Providing, requesting, receiving, seeking, or accepting a Benefit related to the Manipulation of Event or any other form of corruption. Without limiting the generality of the foregoing, this includes:

- a) fixing or contriving in any way or otherwise improperly influencing (or being a party to the fixing, contriving or other improper influencing of) the result, progress, outcome, conduct or any other aspect of an Event;
- b) ensuring the occurrence of a particular incident in an Event, the occurrence of which is to the Covered Person's knowledge the subject of a Bet and for which the Covered Person or another Person expects to receive or has received a Benefit;
- c) failing to perform to the best of one's abilities in an Event, in return for a Benefit or the expectation of a Benefit (irrespective of whether such Benefit is in fact given or

- received) or further to another agreement with a third party;
- d) seeking, accepting, offering, or agreeing to accept or offer, a bribe or other Benefit to fix or contrive in any way or otherwise to influence improperly the result, progress, outcome, conduct or any other aspect of an Event (irrespective of whether such bribe or other Benefit is in fact given or received); and/or
 - e) providing, offering, giving, requesting or receiving any Benefit in circumstances that the Covered Person knew or should have known could undermine public confidence in the integrity of any Event or the sport of Aquatics generally (irrespective of whether such Gift or other Benefit is in fact given or received).

11.1.4 Inside Information:

- a) Using Inside Information for the purposes of Betting, manipulating Events or any other corrupt purposes, whether such use is by the Covered Person or via another person and/or entity.
- b) Disclosing Inside Information to any person and/or entity, with or without Benefit, where the Covered Person knew or should have known that such disclosure might lead to the information being used for the purposes of Betting, manipulating Events or any other corrupt purposes.
- c) Giving and/or receiving a Benefit for the provision of Inside Information regardless of whether any Inside Information is actually provided.

11.2 Committing any act not otherwise prohibited under this Integrity Code that amounts to a violation of any applicable criminal or other law

or regulation where such violation could undermine public confidence in the integrity of an Event or the sport of Aquatics generally.

11.3 The following matters are not relevant to the determination of a violation of this Chapter:

- a) whether or not the Covered Person actually participated, or was assisting an Athlete who participated, in the specific Event in question;
- b) the outcome of the Event on which the Bet was made;
- c) whether or not any Benefit or other consideration was actually given or received;
- d) the nature or outcome of any Bet in issue;
- e) whether or not the Covered Person's efforts or performance (if any) in any Event in issue were (or could be expected to be) affected by the act(s) or omission(s) in question;
- f) whether or not the result or any other aspect of the Event in issue was (or could have been expected to be) affected by the act(s) or omission(s) in question;
- g) whether or not the manipulation of any Event or other corrupt conduct included a violation of a technical rule of World Aquatics or any Continental Organisation or World Aquatics Member; and
- h) whether or not the Event was attended by a representative of World Aquatics or any Continental Organisation, World Aquatics Member or other competent Sports Organisation.

12. RELATIONSHIPS WITH BETTING ORGANISATIONS

- 12.1 A Covered Person may not have a business association or enter into any business arrangement (whether formal or informal) with any Betting Organisation that involves the payment of any monies to or by, or the conferring of any benefit(s) or advantage(s) upon or by, the Covered Person, either directly or indirectly, as a result of such association or arrangement.
- 12.2 As an exception to Article 12.1, a Covered Person will not violate the Integrity Code if he/she is employed by, or has a business association with, a parent company that has a Betting Organisation as a subsidiary company (or if Betting is a business interest of any subsidiary company), provided that the Covered Person can prove that: (i) he/she has no direct involvement with the subsidiary, (ii) that he/she derives no direct or indirect benefit from the subsidiary, and (iii) that the parent company's business does not involve Betting.
- 12.3 A Covered Person shall be considered to have violated Article 12.1 if any Related Party has a controlling interest in a Betting Organisation, or a substantial relationship with a Betting Organisation, or is employed in the day-to-day operational control of a Betting Organisation, unless this is disclosed to, and recorded and approved by, the PAQ Integrity Officer.

SAFEGUARDING RULES

13. FORBIDDEN CONDUCT

- 13.1 The following Forbidden Conduct - acts of hazing, neglect, psychological abuse, physical abuse, sexual harassment and sexual abuse - shall constitute an Integrity Code Violation:

- a) Hazing: Any intentional action taken or any situation created, as a condition of joining or being socially accepted by a group, team or organization, that causes embarrassment, harassment or ridicule, and risks emotional, physical or sexual harm to a Covered Person, regardless of the individual's willingness to participate.
- b) Neglect: The failure of a Covered Person with a duty of care towards another Covered Person to provide a minimum level of care to that Covered Person which is causing harm, encouraging harm, allowing harm to be caused, or creating imminent danger of harm – for example, forced training in unsafe training venues/equipment; failure to provide adequate nutrition/ fluids while training; or failure to protect the Athlete from environmental risks (heat/cold/dangerous open water swimming environments).
- c) Psychological Abuse: A pattern of deliberate, prolonged, repeated non-contact behaviours that risk psychological or emotional harm, within a power differentiated relationship.
- d) Physical Abuse: Any deliberate and unwelcome act – such as, for example, punching, beating, kicking, biting and burning – that causes physical trauma or injury. Such an act can also consist of forced or inappropriate physical activity (e.g., inappropriate age or physique training loads; when injured or in pain), forced alcohol consumption, or forced doping practices.
- e) Sexual Harassment: Any verbal, physical or other conduct of a sexual nature, including in writing, by pictures or cyber communicated, which is unwelcome or where consent is

coerced, manipulated or cannot be given. Sexual Harassment includes sexual advances, requests for sexual favours, and other verbal or physical conduct of a sexual nature when such conduct is made either explicitly or implicitly.

- f) Sexual Abuse: Any conduct of sexual nature, whether non-contact, contact or penetrative, where consent is coerced/manipulated or is not or cannot be given.

ENFORCEMENT OF THE INTEGRITY CODE

14. THE INTEGRITY UNIT RULES

- 14.1 The PAQ Integrity Unit is responsible for the enforcement of this Code, including assessment, investigation, adjudication and sanctioning of potential Integrity Code Violations. PAQ shall not be responsible for enforcing the integrity code of any PAQ Member or World Aquatics.
- 14.2 The PAQ Integrity Officer, in consultation with the PAQ Executive Committee, from time to time, shall establish a panel of persons available to act as members of the PAQ Integrity Unit, which is to include the PAQ Integrity Officer. Upon a potential Integrity Code Violation occurring and requiring investigation, the PAQ Integrity Officer may appoint three (3) neutral persons from the PAQ established panel to act as the PAQ Integrity Unit for that potential violation. Alternately, the PAQ Integrity Officer, in consultation with the PAQ Executive Committee and with the agreement of AQUA, may delegate the duties of the PAQ Integrity Unit with respect to that potential violation to the AQIU. The PAQ Integrity Officer may consult with the PAQ Legal Committee for advice in making any delegation.

14.3 The PAQ Integrity Unit shall be responsible for enforcing this Code insofar as it relates to Integrity Code Violations in respect only of a PAQ Event or matter related specifically to PAQ, and not World Aquatics or PAQ Member Events or matters. To the extent that an Integrity Code Violation also amounts to a breach of the World Aquatics Integrity Code or the integrity code of a PAQ Member, the PAQ Integrity Unit shall liaise with those parties to ensure that the matter is dealt with by the responsible body. PAQ shall defer to the AQIU which shall take primacy over matters deemed to be within its jurisdiction.

15. MONITORING

15.1 The PAQ Integrity Unit may take all practical steps within its power to prevent and investigate potential Integrity Code Violations, including:

- a) monitoring Betting, including monitoring any irregular Betting patterns that might occur;
- b) operating a reporting / whistleblowing hotline;
- c) establishing effective channels for cooperation (including but not limited to the exchange of intelligence and information) between PAQ, the AQIU and World Aquatics, or PAQ and other competent authorities (including national and international criminal, administrative, professional and/or judicial agencies) in relation to the investigation and prosecution of conduct that is prohibited under this Integrity Code and/or under other applicable laws or regulations;
- d) exchanging information with other relevant sports organisations (for example, the International Olympic

- Committee) in relation to corruption in sport; and
- e) Introducing education programmes.

16. REPORTING

- 16.1 Any person may report an alleged Integrity Code Violation to the PAQ Integrity Unit via the official channels described on the PAQ website.
- 16.2 The PAQ Integrity Unit shall acknowledge receipt of the report, although the person submitting the report shall have no entitlement for proceedings to be opened, to be involved in the proceedings or to be informed of any decision made. The PAQ Integrity Unit will ensure that, in the full discretion of the PAQ Integrity Unit, any person who can be deemed to be directly concerned is duly consulted, in particular as regards establishing facts. The PAQ Integrity Unit shall also inform the Complainant, provided they are directly concerned by the facts of the case, of: (i) the opening of proceedings, (ii) imposition of Provisional Measures, (iii) the findings of the decision, as well as any considerations related to the facts which concern such person directly. Upon request, this information may also be provided by the PAQ Integrity Unit to any other person who is directly concerned and has a legitimate interest. The information shall be provided at the same time as notification to the Parties to the proceedings.
- 16.3 Reporting under this Integrity Code may be made anonymously. Anonymity means that PAQ Integrity Unit Officials will not know the personally identifying information of the reporter. The identity of any Claimant may only be disclosed if such disclosure

is both necessary for the purposes of any investigation into an alleged Integrity Code Violation and the consent in writing of the person to the disclosure of his or her identity has been obtained.

- 16.4 The transfer to the PAQ Integrity Unit of a potential Integrity Code Violation reported directly to PAQ shall be deemed to be a report under this Integrity Code.

17. ASSESSING

- 17.1 The PAQ Integrity Officer shall first assess whether the Report relates to an alleged Integrity Code Violation. In carrying out a preliminary analysis, the PAQ Integrity Officer will assess whether the PAQ Integrity Unit has prima facie jurisdiction to investigate the Report and whether the Report has any reasonable prospect of establishing one or more Integrity Code Violations. Where the PAQ Integrity Officer considers that the PAQ Integrity Unit does not have jurisdiction or that the Report has no reasonable prospect of establishing one or more Integrity Code Violations, the PAQ Ethics Officer may decide, in his/her full discretion, to take no further action other than informing the PAQ Executive Committee that the case is closed. Such decision is not subject to appeal.
- 17.2 Where the conduct reported to it could be pursued as either an Integrity Code Violation by the PAQ Integrity Unit, the AQIU or a PAQ Member, the PAQ Integrity Unit shall decide whether to pursue the matter under this Integrity Code or to refer the matter to the AQIU or the PAQ Member (as applicable). Where a PAQ Member fails to act effectively in respect of the matter, the PAQ Integrity Officer (at that person's absolute discretion) may pursue the matter in accordance with this Integrity Code. Where

a matter is already under consideration by the AQIU, the AQIU shall take primacy over proceedings.

- 17.3 If the PAQ Integrity Officer considers it appropriate to do so, the PAQ Integrity Officer may ask any person filing a Report to provide further information, or make other enquiries.
- 17.4 If the evidence submitted with, or subsequent to, any Report is considered by the PAQ Integrity Officer to establish a prima facie case of an Integrity Code Violation, the PAQ Integrity Officer will cause an investigation to be commenced, unless in the view of the PAQ Integrity Officer, there is a good reason not to cause an investigation to be commenced either immediately or at all.
- 17.5 Grounds do not need to be given for the initiation of an investigation for an alleged Integrity Code Violation and the decision may not be contested. The Covered Person may be notified of the commencement of such an investigation and of the possible Integrity Code Violation(s) to which the investigation relates and may be afforded the right to make a written submission as part of the investigation or may be asked to participate in an interview. The Covered Person must cooperate with any request for an interview under this Code and any refusal to do so shall be deemed to be an Integrity Code Violation.
- 17.6 The PAQ Integrity Officer may write to any Covered Person against whom a prima facie case has been found to exist, to ask whether or not that person wishes to admit any Integrity Code Violation(s) and enter an agreed-upon sanction. In this case, the PAQ Integrity Officer will submit the matter to the PAQ Integrity Unit, including the PAQ Integrity Officer, for ratification of a

settlement agreement.

- 17.7 At any time, either before, during or after an investigation, they may refer any information received from a Report or otherwise, to the appropriate criminal authorities or other regulatory or law enforcement bodies, whether required by law or not.

18. PROVISIONAL MEASURES

- 18.1 The PAQ Integrity Unit may impose provisional measures on the Covered Person pending completion of the investigation and a decision, if it considers that the safety or well-being of a person, and/or public confidence in the integrity of the sport of Aquatics is at risk pending the outcome of the investigation. The Covered Person may not be given an opportunity to submit their position before provisional measures are imposed. Any provisional measures imposed will take effect from the date of receipt of notice of provisional measures from the PAQ Integrity Unit's decision. A copy of the decision to impose provisional measures on the Covered Person shall be notified to the Covered Person, as well as his/her/its PAQ Member.
- 18.2 There shall be no appeal against a decision to impose provisional measures.
- 18.3 During the period of any provisional suspension, a Covered Person will be subject to the same restrictions that apply during a period of ineligibility, as set out in the Integrity Code.
- 18.4 A Covered Person, at any time, may accept a voluntary provisional suspension pending determination of the charge(s) against that person. Such voluntary provisional suspension will come into

effect only upon receipt by the PAQ Integrity Unit of written confirmation of the Covered Person's acceptance of the provisional suspension.

- 18.5 No admission may be inferred, or other adverse inference drawn, from a Covered Person's acceptance of a voluntary provisional suspension.
- 18.6 Any period of provisional suspension served and complied with (whether voluntarily or otherwise) shall be credited against any period of suspension subsequently imposed on the Covered Person.

19. INVESTIGATING POTENTIAL INTEGRITY CODE VIOLATIONS

- 19.1 The PAQ Integrity Unit may make a written Demand to a Covered Person to provide any document, information, or item that it reasonably believes may evidence, or lead to the discovery of evidence, of an Integrity Code Violation.
- 19.2 The PAQ Integrity Unit shall have the power to call any Covered Person or other person as a witness to participate in an interview. Any Covered Person shall be obliged to cooperate with such interview and may be accompanied by a legal representative.
- 19.3 A refusal or failure by a Covered Person to comply immediately with a request for interview shall constitute a separate violation of this Integrity Code. Any attempted or actual damage, alteration, destruction or hiding of any documents, information, or item relevant to the investigation, whether before or after a Demand is issued, shall constitute a further separate violation of this Integrity Code.

20. EVIDENCE BURDEN AND STANDARD OF PROOF

- 20.1 The PAQ Integrity Unit/Officer will have the burden of establishing that an Integrity Code Violation has been committed on the balance of probabilities.
- 20.2 Facts shall be established by any reliable means. The PAQ Integrity Unit, at its own discretion, shall determine the admissibility, relevance, materiality and weight of the evidence offered.
- 20.3 The principle of strict liability applies. Violations are punishable regardless of whether they have been committed intentionally, recklessly, and/or negligently.
- 20.4 The PAQ Integrity Unit may draw an adverse inference against any Covered Person who fails to comply with any request for information, documentation or assistance, or fails to cooperate with the investigations process.

21. DECISION PROCESS

- 21.1 Once the accused person has been given due process, the PAQ Integrity Unit shall determine whether an Integrity Code violation has been committed. Where it determines that a violation has been committed, it shall also determine, in its discretion, the appropriate sanction(s) in accordance with the Code.

22. SANCTIONS

22.1 Any one or more of the following sanctions may be imposed for an Integrity Code Violation:

- a) a warning as to future conduct;
- b) a reprimand;
- c) a fine in an amount proportionate to the seriousness of the violation;
- d) an order of reimbursement or restitution;
- e) a suspension from carrying out specific activities on behalf of PAQ and/or a PAQ Member for a specified period;
- f) a period of ineligibility, the length of which is to be determined based on what is proportionate in the circumstances of the case, taking into account in particular: (i) the nature of the violation(s), (ii) the degree of fault of the Covered Person, (iii) the harm that the violation(s) has/have done to the sport, (iv) the need to deter future violations, and (v) any specific aggravating or mitigating factors;
- g) other loss of privileges, 'no contact' directives, requirements to complete educational or other programs, return of PAQ awards, or any other restrictions or conditions as deemed necessary or appropriate; and
- h) any other sanction deemed appropriate, including, but not limited to, disqualification of results, annulment of results of any Event, removal from office, forfeiture of points and/or of quota places and/or of hosting rights, other loss of privileges, 'no contact' directives, requirement to complete educational or other programs, and return of PAQ awards.

- 22.2 The sanction(s) to be imposed in a particular case shall be determined by reference to all the relevant circumstances of the case, including an assessment of the seriousness of the violation, and any mitigating or aggravating factors that may be present.
- 22.3 Aggravating factors may include (without limitation):
- a) the age or experience or position of trust or authority of the Covered Person (e.g., as coach of the team);
 - b) the Covered Person's previous disciplinary record, including in particular any prior violations of this Integrity Code or similar offences;
 - c) any finding that the Covered Person violated more than one Article of this Integrity Code or violated the same Article more than once;
 - d) any finding that the Covered Person received or expected to receive a significant Benefit as a result of any violation;
 - e) any finding that the Covered Person's violation affected or had the potential to affect the course or outcome of an Event;
 - f) any finding that the violation was part of a broader scheme involving other Covered Persons, including evidence of coercion backed up by threats;
 - g) the Covered Person's deceptive and/or obstructive behaviour during the course of PAQ's investigation and/or the proceedings before the PAQ Integrity Unit, such as providing no (or incomplete or inaccurate) information in response to questions or requests for information, or pursuing frivolous

arguments or defences; and/or

- h) a lack of remorse on the part of the Covered Person (including, for example, refusing to take part in integrity educational programs if organised by PAQ).

22.4 Mitigating factors may include (without limitation):

- a) the youth or inexperience of the Covered Person and/or any finding that there was taken advantage of the Covered Person by more experienced or more senior Covered Persons;
- b) the Covered Person's good previous disciplinary record;
- c) any finding that the Covered Person did not receive or expect to receive any significant Benefit as a result of the violation(s);
- d) any finding that the Covered Person's violation(s) did not affect or have the potential to affect the course or outcome of an Event;
- e) the Covered Person's timely admission of a violation when confronted with the alleged violation(s);
- f) the Covered Person's cooperative behaviour during the course of the investigation and/or the proceedings before the PAQ Integrity Unit, such as providing information requested on a timely and complete basis, and/or volunteering information;
- g) the Covered Person's provision of Substantial Assistance (provided that the extent of the mitigation will depend mainly on the extent to which the Substantial Assistance

enabled the PAQ Integrity Unit or other relevant authority to establish other violations of this Integrity Code or other applicable laws or regulations); and

h) the Covered Person displaying remorse (including, for example, by agreeing to take part in integrity educational programmes, if organised by PAQ).

22.5 Where more than one violation has been committed, the sanction will be based on the most serious violation and increased, as appropriate, depending on the specific circumstances.

22.6 Any period of ineligibility imposed under the Code will commence on the date it is imposed, or otherwise accepted by the Covered Person, with credit given for any period of provisional suspension served.

22.7 During any period of ineligibility or provisional suspension, a Covered Person may not: (i) participate in any Event; (ii) attend any other Aquatics-related activity organised by or on behalf of PAQ, World Aquatics or any other Continental Organisation or PAQ Member, save that at PAQ's invitation, attendance is allowed in an educational capacity as part of an integrity programme organised by PAQ; and (iii) hold or be a candidate for any position (or have any dealings) as a PAQ Official or Other Official. Any potential violation of the period of ineligibility shall be considered an Integrity Code Violation and shall be pursued in accordance with the ENFORCEMENT OF THE INTEGRITY CODE Chapter of this Integrity Code.

22.8 If a Covered Person is found to have violated a period of

ineligibility, the period of ineligibility originally imposed in accordance with this Integrity Code shall recommence from the date of such violation (disregarding the period of ineligibility served prior to such violation) and (where applicable) the Covered Person shall be immediately disqualified from the relevant Event.

22.9 This Integrity Code shall continue to apply to any ineligible Covered Person and separate proceedings may be brought against the Covered Person under this Integrity Code for any violation committed during the period of ineligibility.

22.10 As part of an informal or formal resolution of any matter, a Covered Person may be required to complete an appropriate education or rehabilitation programme pertaining to the prevention of harassment and abuse as a condition of eligibility or as an independent sanction.

23. RIGHT OF APPEAL

23.1 Decisions determining that an Integrity Code Violation has been committed may be appealed by any Party to the proceedings in question exclusively to the CAS.

23.2 To be admissible, an appeal to the CAS must be filed with the CAS within twenty-one (21) calendar days of the appealing Party's receipt by email of the written reasoned decision in question. A copy of the appeal shall be served at the same time on every other Party. Only the notification by email of the full Decision is relevant for the purposes of calculating the time limit to appeal to the CAS. The appeal shall comply with the applicable rules and

requirements of the CAS Code of Sports-related Arbitration.

- 23.3 An appeal to the CAS shall not have any suspensive effect. Accordingly, pending the resolution of the appeal by the CAS, the decision being appealed (including any sanction(s) imposed) will remain in full force and effect (unless the CAS orders otherwise).

24. RECOGNITION OF DECISIONS AND PROVISIONAL MEASURES

- 24.1 Decisions taken under this Integrity Code, including decisions on provisional measures and decisions of the CAS on appeals submitted to the CAS, are applicable worldwide and must be recognised, respected and given effect by PAQ, and all PAQ Members, without the need for any further formality.
- 24.2 PAQ, World Aquatics, and all PAQ Members shall recognise and take all necessary and reasonable steps within their powers to enforce and give effect to all decisions taken under the regulations of World Aquatics, PAQ or a PAQ Member, adopted in accordance with this Integrity Code.
- 24.3 The PAQ Integrity Unit shall be able to consult with the AQIU, subject to confidentiality arrangements, when it becomes aware of a case being investigated by a PAQ Member.

25. STATUTE OF LIMITATIONS

- 25.1 Except in the case of Sexual Abuse, which is not subject to any statute of limitations, the statute of limitations period for claims filed under this Code is ten (10) years from the last date when the

Forbidden Conduct or Integrity Code Violation is alleged to have occurred.

- 25.2 In the case of Forbidden Conduct, if the Forbidden Conduct is alleged to have occurred while the Claimant was a Minor, the statute of limitations period is ten (10) years from the date upon which the Claimant becomes of the age of majority in the country where the alleged Forbidden Conduct mainly occurred.